

Exhibit D

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA

VALERIE W. WAKEFIELD,) CIVIL DMSION
)
Plaintiff,) Civil Action No. 05 CV 79 - Erie)
) Honorable Maurice B. Cohill, Jr.
v.)
)
JOY MINING MACHINERY)
COMPANY, a division of Haxnischfeger) JURY TRIAL DEMANDED)
Industries,)
) .
Defendant.	

COM:MONWEALTH OF PENNSYLVANIA

SS

COUNTYOFVENANOO"

AFFIDAVIT OF DANIEL BLAUSER

The undersigned, Daniel Blauser, being sworn, deposes and states as follows based
on personal knowledge:

1. My name is Daniel Blauser.
2. I have been employed by Joy Mining for 31 years and have held the following
positions: draftsman, engineering change technician, specifications engineer, manager
product services and demand manager.
3. I know Jill Seyler.
4. I knew MIS. Seyler's late husband
5. I knew Mr. Seyler because we worked together at Joy for approximately 20
years and were friends.
6. Mr. Seyler passed away in September of 1998.

7. Following Mr Seyler's death, I was instrumental in Mrs. Seyler coming to work at Joy.

8. From February of 2000 to March of 2003, Mrs. Seyler worked for me as a secretary. I was her direct supervisor.

9. I felt personally responsible for Mrs. Seyler's well-being, based on my personal friendship and business relationship with her late husband.

10. Mrs. Seyler's work station was located close to my office.

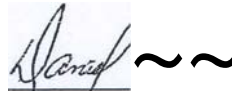
11. I know Larry Meade.

12. I never overheard Mr. Meade say anything to Mrs Seyler that either she or I viewed as objectionable in any way.

13. Mrs. Seyler never brought to my attention that she was uncomfortable with Mr. Meade.

14. I am familiar with Joy's harassment policy,

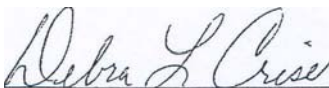
15. Given my personal relationship with Mr. Seyler and my personal concern for Mrs. Seyler's well-being, had she brought any concerns to my attention, or had I personally observed any inappropriate behavior on Mr. Meade's part, I would have taken steps to enforce Joy's harassment policy.



DANIEL BLAUSER

Subscribed and sworn to before me this

15th day of July, 2007.



Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal of Debra L. Crise, Notary Public City
Of Franklin, Venango County My Commission
Expires June 28, 2007 Member, Pennsylvania
Association of Notaries Public